

EXHIBIT G

From: Sara Creighton sara.creighton@americanoversight.org 
Subject: Clarification for request numbers 2019-00704-FOIA-OS, 2019-00705-FOIA-OS, and 2019-00708-FOIA-OS
Date: April 5, 2019 at 2:01 PM
To: kaira.wells@hhs.gov

SC

Ms. Wells,

We received your letters seeking clarification on three of our recently-filed FOIA requests, numbered 2019-00704-FOIA-OS, 2019-00705-FOIA-OS, and 2019-00708-FOIA-OS. In each letter, you stated that the request was not reasonably described because it did not include "the corresponding domain names associated with the individuals and entities described in the complaint."

As an initial matter, we disagree that a requester is required to provide domain names in order to have reasonably described the communications they are requesting. HHS is capable of searching for communications with individuals or entities even without domain names, using basic search functionality. However, in an effort to be accommodating and to assist with the processing of these requests, we have identified domain names associated with the vast majority of entities and individuals at issue in these three requests, as indicated in the attached document.

To be clear, though, we believe that a search for records responsive to these requests should involve more than simply using these domain names in the to/from fields, as we have no way of knowing whether these are the only domain names used by these individuals or entities. In particular, we request that HHS also search for the names of the individuals and entities themselves in full-text searches of the "subject" lines and body text of email communications, as their names/organizations might well appear in a signature block of an email. In addition, if in the course of its search HHS identifies additional domain names associated with these individuals or entities beyond those provided in the attached document, we believe that those domain names should be added to the search.

Finally, because our requests seek communications beyond just emails, a search for responsive records should not be limited to the use of domain names, but should also include full-text searches of other record types as well.

Please do not hesitate to reach out again with additional questions. We are eager to work with you to help with the processing of these requests.

Best,
Sara Creighton
Counsel
American Oversight



Domain
Names.docx



2019-00704-FOIA-OS

All records reflecting communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp), telephone call logs, calendar invitations, calendar entries, meeting notices, meeting agendas, talking points, any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, or other materials reflecting communications) between Secretary Alex Azar or any person communicating on his behalf, such as schedulers or assistants, and any of the individuals or entities listed below:

- 1) Eli Lilly and Company (lilly.com)
- 2) Lilly USA, LLC (lillydiabetes.com)
- 3) Healthcare Leadership Council (hlc.org)
- 4) HMS Holdings, Inc. (hms.com)
- 5) Biotechnology Innovation Organization (bio.org)
- 6) Seraphim Strategies, LLC (we have not identified a domain name for this organization, and so would request that you search for "seraphim" in the to/from/cc/bcc/subject/body fields).

Please provide all responsive records from January 29, 2018, to the date the search is conducted.

2019-00705-FOIA-OS:

All communications (including emails, email attachments, text messages, calendar invitations, calendar entries, meeting notices, meeting agendas, or talking points), as well as any summaries of or notes taken during any oral communications, between Secretary Alex Azar or any person communicating on his behalf, such as schedulers or assistants, and any individuals associated with the entities listed below:

- 1) Johnson & Johnson (jnj.com)
- 2) Pfizer (pfizer.com)
- 3) Novartis (novartis.com)
- 4) Sinopharm Group (sinopharmholding.com)
- 5) Roche (roche.com)
- 6) Sanofi (sanofi.com)
- 7) GlaxoSmithKline (gsk.com)
- 8) Merck & Co (merck.com)
- 9) Bayer (bayer.com)
- 10) Gilead Sciences (gilead.com)
- 11) AbbVie (abbvie.com)
- 12) Amgen (amgen.com)



- 13) AstraZeneca (astrazeneca.com)
- 14) Bristol-Myers Squibb (bms.com)
- 15) Boehringer Ingelheim (boehringer-ingelheim.com)
- 16) Takeda (takeda.com)

Please provide all responsive records from January 29, 2018, to the date the search is conducted.

2019-00708-FOIA-OS:

All communications (including emails, email attachments, text messages, calendar invitations, calendar entries, meeting notices, meeting agendas, or talking points), as well as any summaries of or notes taken during any oral communications) between Secretary Alex Azar or any person communicating on his behalf, such as schedulers or assistants, and any individuals associated with the entities listed below:

- 1) Assembly Biosciences (assemblybio.com)
- 2) Apexian Pharmaceuticals (apexianpharma.com)
- 3) Baxter BioPharma Solutions (baxter.com)
- 4) Catalent (catalent.com)
- 5) Endocyte (endocyte.com)
- 6) Evonik (evonik.com)
- 7) Exelead (exeleadbiopharma.com)
- 8) KP Pharmaceutical Technology (kppt.com)
- 9) Lannett (lannett.com)
- 10) Mead Johnson (mjn.com)
- 11) Novo Nordisk (novonordisk.com)
- 12) PD Pharmatech (jlmpharmatech.com)
- 13) IQVIA (iqvia.com)
- 14) AIT Bioscience (aitbioscience.com)
- 15) Anagin (anagin.com)
- 16) Maetrics (maetrics.com)
- 17) Theratome Bio (theratomebio.com)

Please provide all responsive records from January 29, 2018, to the date the search is conducted.